

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
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Via ECF and FedEx

April 19, 2016

Magistrate Judge Frank Maas
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 740
New York, NY 10007

Re: In Re: Terrorist Attacks on September 11, 2001,
03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

On behalf of the *O'Neill, Ashton, and Federal Insurance* Plaintiffs, I am writing to request the deadline to respond to the *Havlish* counsel's Motion for Creation of a Common Benefit Fund (ECF No. 3235) be extended from April 22, 2016 to May 2, 2016. See ECF No. 3241.

In light of other significant conflicting demands on counsel time in the past ten (10) days, we will be unable to complete the preparation of the appropriate response which the application deserves.

I have repeatedly asked movants' counsel for their position on this request but unfortunately have not received a response.

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Accordingly, in the interest of justice, we are requesting an extension from the present due date until May 2, 2016.

Respectfully submitted,



Jerry S. Goldman
Anderson Kill PC
FOR THE O'NEILL, ASTON and FEDERAL
INSURANCE PLAINTIFFS

cc: The Honorable George B. Daniels (via FedEx)
All Counsel of Record (via ECF)